



STARBOARD TEN, INC.
MARITIME FORENSIC SERVICES

SUPPLEMENTED DISCLOSURE
OF
ADDITIONAL INFORMATION CONSIDERED & ERRATUM
IN CONNECTION WITH THE
MAY 9, 2024
EXPERT OPINION REPORT
OF
CAPTAIN JOHN C. TIMMEL
IN THE CASE OF
UNITED STATES OF AMERICA
V.
GREG ABBOTT

COURT: IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CASE NO.: 23 - CV - 00853

SUPPLEMENT DATE: JUNE 4, 2024

PREPARED BY: CAPTAIN JOHN C. TIMMEL
STARBOARD TEN, INC.
3013 HAWTHORNE ROAD
TAMPA, FLORIDA 33611
JOHNTIMMEL@STARBOARDTEN.COM
(813) 294-9811

VII. ADDITIONAL DOCUMENTS, MATERIALS, AND DATA CONSIDERED

8. Site Observations and Other Data Considered after May 9, 2024, and Prior to Deposition:
 - A. Defendant's First Amended Interrogatories – May 24, 2024
 - B. Second Site Visit to Eagle Pass, Texas, Section of Rio Grande – June 4, 2024
 - a. Additional Conversations with CBP Personnel

VIII. EXPERT'S C.V.

HONORS (Additional Honor Received after May 9, 2024, and Prior to Deposition)

Florida Council of Yacht Clubs (FCYC) – Yachtsman of the Year Award West – 2023

The FCYC represents approximately 40,000 boaters. Visited all 37 FCYC clubs cruising the entire coastline of Florida and traversing approximately 2,700 miles.

ERRATUM

1. On page 25 of my May 9, 2024, report it states the barrier structure has seventy-five (75) concrete mooring anchors that weigh approximately one thousand five hundred (1,500) pounds each. This information was derived from the sworn testimony of Mr. Loren Flossman who works for Cochran USA. On page 96, lines 11–13 of the trial transcript it states, "Approximately 3,000 pounds each of the 68 anchors, and then there's some positioning anchors that are about half that weight, 75." I understood Mr. Flossman's testimony to mean each of the anchors weigh approximately one thousand five hundred (1,500) pounds. However, in the Defendant's First Amended Interrogatories dated May 24, 2024, it states that the positioning anchors weigh one hundred and fifty (150) pounds each, not one thousand five hundred (1,500) pounds. One hundred and fifty (150) pounds per positioning anchor is corroborated by an additional source.
2. On page 32 of my May 9, 2024 report, the erroneous one thousand five hundred (1,500) number instead of one hundred and fifty (150) pounds per positioning anchor is used in a calculation. The incorrect product is stated as one hundred and fifty-eight (158) tons, which equals three hundred and sixteen thousand, five hundred (316,500) pounds. The correct product is one hundred seven and six-tenths (107.6) tons, or two hundred and fifteen thousand, two hundred and fifty (215, 250) pounds.

EXPERT'S STATEMENT & SIGNATURE

Section VII of my May 9, 2024, expert report in this case is supplemented with additional site observations and other materials that I considered after that date and a numerical erratum that I discovered and corrected within my report. This additional information does not change the opinions I expressed in my report.

A handwritten signature in blue ink, appearing to read "J. C. [unclear]".

Signature

June 4, 2024

Date